

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.

HILLSBOROUGH COUNTY SUPERIOR COURT - NORTH
STATE OF NEW HAMPSHIRE

V.

ADAM MONTGOMERY

216-2022-CR-20

216-2022-CR- 2372

REQUESTED ADDITIONAL JUDGE CONDUCTED VOIR DIRE

Now comes Adam Montgomery, by and through his Public Defenders, Caroline L. Smith, Esq., and James T. Brooks, Esq., and hereby respectfully requests that this Court provide the jury pool with the following additional voir dire questions.

1. Have you read or heard from social media, news outlets, or any other source anything about this case?
2. Have you read or heard from social media, news outlets or any other source about Harmony Montgomery being a missing child?
3. Did you see billboards regarding Harmony Montgomery?
4. Did you or anyone you know call the Manchester Police tipline regarding Harmony Montgomery?
5. Did you or someone you know participate in a vigil for Harmony Montgomery?
6. Were you, a family member, or close friend involved in the search or investigation into the whereabouts of Harmony Montgomery, whether a named witness or not?
7. Were you, a family member, or close friend involved in an investigation of DCYF for the placement of Harmony Montgomery or any other children?

8. There is a charge of abuse of a corpse. There will be some disturbing and graphic testimony offered about that charge. Is there anything about this type of testimony that may prevent you from being a fair and impartial juror?
9. Did you frequent Portland Pie restaurant at the corner of Elm Street and Merrimack Street in Manchester, NH in 2020?
10. Were you, a close friend, or family member a victim of domestic abuse?
11. Were you, a close friend or family member accused of domestic abuse, whether true or not?
12. Were you, a close friend, or family member related to a victim of homicide?
13. Were you, a close friend, or family member involved in any investigation into DCYF related to Harmony?

WHEREFORE, Adam Montgomery respectfully requests this Court provide the jury pool with the above additional judge conducted voir dire questions.

Respectfully submitted,

/s/ Caroline L. Smith
Caroline L. Smith, Esq.
NH Bar #5992
NH Public Defender
408 Union Avenue
Laconia, NH 03246
(603) 524-1831

/s/ James T. Brooks
James T. Brooks, Esq.
NH Bar #14876
NH Public Defender
27 John Stark Highway
Newport, NH 03773
(603) 865-1460

CERTIFICATE OF SERVICE:

I hereby certify that a copy of this pleading has been forwarded to Senior Assistant Attorney General Benjamin J. Agati and Assistant Attorney General R. Christopher Knowles on this 15th day of January 2024.

/s/ Caroline Smith
Caroline Smith, Esq.